

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21MC102(AKH)

LUDIVIA CASTELLANOS,

07CV1480(AKH)

Plaintiff(s),

-against-

100 CHURCH LLC, et al.,

Defendants.

---

**NOTICE OF ADOPTION BY  
ZAR REALTY  
MANAGEMENT CORP. OF  
ANSWER TO MASTER  
COMPLAINT**

**PLEASE TAKE NOTICE** that defendant **ZAR REALTY MANAGEMENT CORP.** n/k/a **SAPIR REALTY MANAGEMENT CORP.** for the building located at 100 Church Street, (hereinafter “Zar/Sapir”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Zar/Sapir 's Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **ZAR/SAPIR** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

**PLEASE TAKE FURTHER NOTICE THAT** defendant, Zar/Sapir reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (§ D(1)-(5)).

**WHEREFORE**, Zar/Sapir demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
December 4, 2007

**HARRIS BEACH PLLC**  
*Attorneys for Defendant*  
ZAR REALTY MANAGEMENT CORP. n/k/a  
SAPIR REALTY MANAGEMENT CORP.

\_\_\_\_\_/s/\_\_\_\_\_  
Stanley Goos, Esq. (SG 7062)  
100 Wall Street, 23<sup>rd</sup> Floor  
New York, New York 10005  
(212) 687-0100

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279  
***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006  
***Liaison Counsel for the Defendants***

**All Counsel via ECF**

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on December 4, 2007, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Zar Realty Management Corp.'s Adoption of Answer to Master Complaint.

Dated: December 4, 2007

/s/  
Stanley Goos, Esq. (SG 7062)